

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to:*

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977  
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849  
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978  
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279*

**PLAINTIFFS' FIRST SET OF JURISDICTIONAL REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO ABDULLAH OMAR NASEEF**

THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES  
August 22, 2013

20. Please provide all documents relating to any delegation, commission, task force, or group You participated in during Your tenure as an official representative of the Charities and/or Saudi Arabian government, to assess conditions and needs both within the Kingdom of Saudi Arabia and in other foreign countries, including without limitation, Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, United States, and Yemen. Responsive documents shall include, but are not limited to, copies of Your passports, visas, or other documents authorizing Your entry into those countries.

**ANSWER:**

21. Please provide all documents You received during Your tenure as an official representative of the Charities and/or Saudi Arabian government, which describe, detail, or otherwise relate to delegations, commissions, task forces, or groups of other high-ranking representatives of the Charities and/or Saudi Arabian government, to assess conditions and needs both within the Kingdom of Saudi Arabia and in other foreign countries, including without limitation, Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, United States, and Yemen.

**ANSWER:**

**ANSWER:**

89. From the period beginning January 1, 1988 through 1997, please provide all documents relating to any trips you took to Sudan.

**ANSWER:**

90. From the period beginning January 1, 1988 through 2002, please provide all documents relating to any trips you took to Afghanistan.

**ANSWER:**

91. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Mohammed Jamal Khalifa (a/k/a Abu Bara), including without limitation, all documents relating to Your role in appointing Khalifa to positions within the MWL and IIRO. Responsive documents shall include, but are not limited to, Khalifa's personnel or employment files.

**ANSWER:**

92. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Wa'el Hamza Jelaidan (a/k/a Abu Hasan al Madani), including without limitation, all documents relating to

95. Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

**ANSWER:**

96. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and any of the Golden Chain-Related Individuals, and/or any individual or entity associated therewith.

**ANSWER:**

97. Please provide all documents You and/or the Charities sent to, and/or received from, any of the Golden Chain-Related-Individuals, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and the any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

**ANSWER:**

98. Please provide all documents relating to any accounts in any banking or financial institution You hold or held jointly with, or on behalf of any of the Golden Chain-Related-

Individuals, and/or any individual or entity associated therewith, including any accounts over which You hold or have held signatory authority.

**ANSWER:**

99. Please provide all documents relating to any accounts in any banking or financial institution any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, hold or held jointly with, or on behalf of the Charities, including any accounts over which the Golden Chain-Related-Individuals hold or have held signatory authority.

**ANSWER:**

100. Please provide all documents relating to any investigations or inquiries conducted by any United States Investigator, Foreign Investigator, or KSA Investigator, into financial transactions linked to accounts held solely or jointly by any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

**ANSWER:**

101. Please provide all documents relating to any decision to terminate any relationship with any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, as a result of financial irregularities, suspicious activities, investigations